

Margaret M. Fox
pfox@burr.com
Direct Dial: (803) 753-3293
Direct Fax: (803) 933-1515

Burr & Forman LLP
1221 Main Street
Suite 1800
Columbia, SC 29201

Mailing Address:
Post Office Box 11390
Columbia, SC 29211

Office
Fax (803) 753-3278

BURR.COM

February 24, 2022

Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia SC 29210

**Re: Public Service Commission Review of South Carolina Code of Regulations Chapter
103 Pursuant to S.C. Code Ann. Section 1-23-120(J)
Docket No. 2020-247-A**

Dear Ms. Boyd:

I am writing on behalf of Lockhart Power Company (“LPC”) in response to the Commission’s Notice of Follow-Up Workshop to Discuss Commission Notices Included in Customer Bill Inserts in the above-referenced docket. I intend to participate in the workshop scheduled for Wednesday, March 2 in this matter, along with David Turner, LPC’s Business Controller.

The Commission’s Notice also requested written comments on a draft Customer Bill Insert Notice that was circulated along with the Notice. LPC supports the Commission’s efforts to make customer bill insert notices in utility rate cases more readable and user-friendly. With respect to the specific customer bill insert notice that was circulated, we believe it can and should be streamlined. The draft notice is 3 pages long, and includes notes where additional information such as a “brief description of filing” and “bulleted information, tables, and graphs” would be inserted, which could easily lead to a 4-page or even longer customer bill insert notice. We reiterate our comments of June 17, 2021 in this docket, in which we urged the Commission to keep bill insert notices to 2 pages or less. Keeping bill inserts to 2 pages or less is important not only to keep costs down for both the utility and its customers, but also to ensure that customers will read the notices.

Jocelyn Boyd
February 24, 2022
Page 2

We look forward to working with Commission Staff and other interested parties at the workshop to streamline the draft notice. As a “straw man” proposal, we suggest that the notice be structured generally along the lines of the following:

- (1) A brief description of the filing;
- (2) A brief explanation of the Commission’s role (i.e., the Commission holds hearings and determines what rates a utility can charge);
- (3) The impact the filing, if approved, would have on an average household bill;
- (4) A link for the customer to access more detailed information about the application if desired;
- (5) A timetable for the customer public hearings and hearing on the application, including how customers may participate or livestream if desired;
- (6) Contact information for questions.

As stated in our previous comments, customer notices should clearly convey essential information while at the same time balancing the competing concerns of either being overly simplistic or including too much detail and basic information such that the customer notice becomes unwieldy.

Thank you for the opportunity to provide this input.

Very truly yours,

BURR & FORMAN LLP

/s/ Margaret M. Fox

Margaret M. Fox

cc: All Parties of Record